## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Cibik Law, P.C.

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Attorney for Movant Stan Rajauski

In re:

Costal Construction Group, LLC,

Case No.: 24-15203

Chapter: 11

Debtor.

Judge: Kaplan

## Certification of Counsel in Support of Motion for Relief from the Automatic Stay

- I, Michael I. Assad, being of full age, being duly sworn according to law, upon his oath deposes and says:
  - 1. I am an attorney at law of the State of New Jersey.
  - 2. I represent Stan Rajauski, a creditor in the above bankruptcy case.
  - 3. The Debtor filed this case under chapter 11 on May 22, 2024.
  - 4. On November 16, 2023, the Debtor and Mr. Rajauski signed a contract in which the Debtor agreed to build a home at 8104 Bayview Drive in Lower Township, New Jersey in consideration of payments by Mr. Rajauski.
  - 5. The contract is attached as Exhibit A.
  - 6. Mr. Rajauski paid the Debtor as follows: \$82,960.00 on November 16, 2023, \$81,460.00 on February 24, 2024, and \$81,460.00 on April 19, 2024.
  - 7. As of this date, the Debtor has not begun constructing the home, which constitutes a material breach of contract.

Date: July 19, 2024

Michael I. Assac